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PROJECT XL STAKEHOLDER INVOLVEMENT: A GUIDE FOR PROJECT SPONSORS AND STAKEHOLDERS



ADVISORY NATURE OF THIS GUIDE:

This guide is designed to help potential Project XL sponsors design and conduct effective stakeholder involvement processes during the development of XL proposals and to advise stakeholders — interested community and environmental groups — how to participate effectively in such processes.

The ideas, tools, and resources in this guide are based on the experiences — both successes and difficulties — of others involved in XL and a variety of other stakeholder-based projects and programs.

The recommendations in this guide are not a formal regulation or rule.



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PROJECT XL STAKEHOLDER INVOLVEMENT

The U.S. Environmental Protection Agency (EPA) created Project XL to give companies, communities, state and local agencies, federal facilities, and even industrial sectors, the opportunity to propose cleaner, cheaper, and smarter ways of protecting the environment. Project XL provides real world tests of these innovative strategies. EPA will, after careful evaluation, replace or modify regulatory requirements, policies or procedures if the proposed XL project will produce superior environmental benefits and promote accountability to the public.

To ensure these new approaches truly meet local needs and protect the environment, people from the community, environmental groups and workers are included in evaluating each Project XL proposal. EPA calls this “stakeholder involvement.”

The goal of Project XL stakeholder involvement is a collaborative working relationship between sponsors — the organizations proposing new ways of doing things — and stakeholders — people who believe they or their community could be affected by an XL project.

EPA requirements for stakeholder involvement are defined in the Project XL Federal Register Notice of May 23, 1995, and in the Federal Register Notice titled *Clarifying the XL Process* issued April 23, 1997. Both of these documents can be downloaded from EPA’s website (www.epa.gov/projectxl) or you can get them by calling your EPA regional office XL coordinator (listed in Appendix 1).

EXAMPLES OF XL PROJECTS

Some of the innovations currently being tested as part of Project XL are:

- Taking money spent on compliance with the administrative requirements of the Clean Air Act and spending it to reduce emissions by upgrading and retrofitting equipment.
 - Preparing a single operating and regulatory plan for a manufacturing facility, rather than requiring compliance with a number of individual regulatory permits.
 - Lowering overall air emissions from a facility in return for greater operational flexibility.
 - Substituting a new third-party certified environmental management system (ISO 14001) in place of existing permitting, recordkeeping and reporting requirements.
-

What is the Purpose of This Guide?

Both the sponsor and stakeholders have responsibilities if the XL project is to be successful. If you are a potential sponsor, this guide will show you how to organize an effective process for including the public in designing and evaluating your XL project. If you are from a community where an XL project is under consideration or are a member of an organization that has an interest in an XL project, this guide will show you how to participate effectively.

Section I provides general information that is useful to both stakeholders and potential sponsors. Section II provides advice to stakeholders. Section III provides advice to potential sponsors.





Section I:

PROJECT XL INFORMATION

Who Are the Potential Sponsors of XL Projects?

Any organization or agency whose actions are subject to environmental regulation, policies or procedures is a potential sponsor. Sponsors might include:

- *Companies who use chemicals or other potentially hazardous materials in manufacturing or produce solid waste or emissions to the environment that affect air, water, or land.*

- *Groups of companies or an entire industry, such as the printing or automotive industries, that could achieve superior environmental performance through a large-scale or industry-wide approach to pollution prevention*

- *A federal, state, tribal or local government agency, such as a city or county agency, water district, sanitation district, or economic development agency, whose activities affect air or water quality or use previously polluted land.*

- *Communities who wish to propose new environmental management approaches for a designated geographic area.*

Who Are the Potential Stakeholders?

EPA defines stakeholders as “communities near the project, federal, state, tribal or local governments, businesses, environmental [local, regional and national] and other public interest groups or other similar entities.”

EPA’s guidance identifies three levels of participants and requires that each level be given a chance to participate:

Direct Participants

Direct participants are individuals or groups who choose to work intensively with project sponsors as part of an organized “stakeholder group.”

Commentors

Commentors have an interest in the project, but choose not to participate directly in an organized group. EPA requires sponsors to provide opportunities for commentors to be heard during the development of an XL project. These commentors can still affect the design and implementation through the comments they make.

Members of the General Public

EPA requires sponsors to provide members of the general public with easy access to the proposal development process and to information about the project and its results. Members of the general public also have the right to participate more actively, if they so choose.

Who Are Co-sponsors?

A co-sponsor is a state local or tribal government, or community, environmental or other public interest organization, that joins the sponsor in proposing the project. For example, a local manufacturer might reach an agreement with a coalition of local environmental groups to jointly propose an XL project. This can enhance the credibility of the project. When sponsors work with outside groups to develop a co-sponsoring relationship, they build working relationships that can have continuing benefits for the environment, the community and the sponsoring organizations.

How Much Impact Will Stakeholders Have Upon Decisions?

Stakeholders often worry that “involvement” means they will express their opinions but their opinions won’t be given real weight or importance. The amount of impact that individuals or groups will have upon a decision depends, at least in part, on the level at which they choose to participate.

If they enter into an agreement with a project sponsor to be a “co-sponsor,” they will actually be a co-decision maker.

If they choose to become a “direct participant” — a member of a stakeholder group advising a potential sponsor—they will be working directly with the sponsor. At the beginning of the process they and the sponsor will discuss and agree upon their roles during decision making.

EPA will review both the sponsor’s proposal and the recommendations of the direct participants. EPA has stated that the views of direct participants should strongly influence the details of the project as well as EPA’s ultimate decision whether to accept the project.

If individuals or groups choose not to be part of a stakeholder group but simply to comment upon the XL proposal, both the sponsor and EPA will carefully review their comments. Substantive comments will be

addressed and, if necessary, discussed with the commentor. EPA believes that the views of informed commentors are a strong indicator of whether the approach or technology in the proposal may be suitable for use in other locations. EPA’s ultimate decision whether to accept the project.

If individuals or groups choose not to be part of a stakeholder group but simply to comment upon the XL proposal, both the sponsor and EPA will carefully review their comments. Substantive comments will be addressed and, if necessary, discussed with the commentor. EPA believes that the views of informed commentors are a strong indicator of whether the approach or technology in the proposal may be suitable for use in other locations.

EPA uses “stakeholder support” as one of the criteria in evaluating whether to accept an XL proposal. EPA is not going to accept an XL proposal that faces across-the-board stakeholder opposition. If a project sponsor wants its proposal accepted, it must credibly address stakeholder concerns and find an approach that is generally acceptable.

How Does an XL Project Get Developed?

Every XL project goes through a process in which the sponsor prepares and submits a proposal to EPA for acceptance. This process is shown in **Figure 1** on the next page.

The sponsor starts the stakeholder involvement process by inviting stakeholders to participate in developing the proposal and overseeing the development of the final agreement between the sponsor and EPA. The sponsor initiates the process, sets up forums in which stakeholders can participate, and may even provide funds for third-party technical assistance or meeting facilitation. EPA can also assist in these efforts (See *Appendix 2*). But stakeholder involvement works best when the sponsor and stakeholders work together to create both the proposal and the process.





Section I: PROJECT XL INFORMATION

DEVELOPING AN XL PROJECT

Figure I

PREPROPOSAL

The sponsor decides whether to prepare a proposal, begins to define what to include in the proposal, and begins talking — often informally — with EPA and state regulators and with people from community and environmental groups to determine whether a proposal would be likely to receive support.



PROPOSAL DEVELOPMENT

The sponsor gets specific about the details of the project and develops a formal proposal. Normally a sponsor will set up a stakeholder group of people (direct participants) willing to consult with the sponsor on a continuing basis and will also provide opportunities for other interested people (commentors) to comment in meetings, or by mail or e-mail. The sponsor also provides information about its proposal to the general public. The proposal will document how the sponsor worked with stakeholders and the support the proposal has received from stakeholders.



EPA/STATE PROPOSAL REVIEW

EPA and state regulators then review the proposal. If the proposal affects tribal lands, the tribal regulatory agency will also be a reviewer. The government agencies may ask formal questions of the sponsor about the proposal or may require revisions to the proposal. EPA and the sponsor will consult with stakeholders about any significant changes in the proposal.



FINAL PROJECT AGREEMENT

If EPA and the other reviewers find the proposal generally acceptable, a written agreement called the Final Project Agreement will be prepared. The Final Project Agreement spells out what actions the sponsor will take to protect the environment, the modifications EPA and /or the state will make in its normal regulatory practices, policies and procedures, the manner in which results will be measured, and how information will be transmitted to the regulators and stakeholders. Stakeholders will have the opportunity to comment upon a draft version of the Final Project Agreement.



PROJECT IMPLEMENTATION

Once the Final Project Agreement is signed, the sponsor begins to implement the project. The Final Project Agreement developed in the last step describes how stakeholders will be involved during implementation.

Where In the Process Does Stakeholder Involvement Occur?

Preproposal

Normally, sponsors will hold preliminary discussions with EPA and state regulators before there is much open discussion with the community. This is done to screen out projects that have no chance of acceptance and allows the regulators to communicate informally with sponsors about whether their environmental compliance record justifies consideration as an XL sponsor.

But once these initial discussions with the regulators have occurred, informal stakeholder involvement is strongly recommended in the preproposal stage, although it is not required.

Stakeholder involvement at this stage, even if it is informal, can prevent creation of a project that has little chance of community or stakeholder acceptance. It can also produce ideas that can make a difference in making a proposal acceptable.

Proposal Development

EPA requires the sponsor to work closely with *direct participants* (those people who are part of an actual stakeholder group), as well as to provide opportunities for *commentors* (people who make comments at meetings or write letters or e-mail messages) to offer ideas. The proposal itself will document the manner in which the sponsor has worked with stakeholders and the support the proposal has received from stakeholders.

EPA/State Proposal Review

Stakeholders should be consulted throughout this stage, since responses or revisions resulting from discussions with EPA or other regulators could substantially alter the scope or content of the project.

Development of

Final Project Agreement:

The Final Project Agreement spells out how stakeholders will be involved throughout the life of the project.

Under EPA procedures, stakeholders will have the opportunity to make comments directly to EPA or other regulators on the draft Final Project Agreement.

People who have participated in developing a proposal often are upset if changes are made unilaterally. If during the development of the Final Project Agreement EPA and the sponsor identify significant changes in the proposal, the sponsor and EPA will discuss these changes with the stakeholder group. One of the advantages of discussing this information with stakeholders is that they may be able to suggest options or help the sponsor and agencies move towards resolution if things get stalled.

As the final decision maker, EPA must balance the needs and interests of the sponsors and stakeholders with the legal requirements and other constraints within which EPA must operate. Sometimes these legal constraints can make EPA appear unresponsive to the concerns that have been expressed. EPA always tries to provide a clear rationale for decisions it makes that run counter to comments it receives from sponsors and stakeholders.

Project Implementation

Once the Final Project Agreement (FPA) is signed, the sponsor can begin implementing the project. The FPA describes how stakeholders will be involved throughout implementation. For example, stakeholders may play a role in monitoring the environmental results of the project. Outcomes from project implementation should be reported both to the regulators and stakeholders on a periodic and regular basis.





IF YOU ARE A STAKEHOLDER

How Can You Or Your Organization Participate?

Treat any XL project as your opportunity to:

- Have a voice in important environmental issues that could affect your community.
- Be a part of developing and testing innovative approaches that could ultimately be adopted at a national level.

1) The first step is to get information about what's going on. Remember that even though this may be the first you've heard of the project, the process may have been going on for some time. There are several ways you can get information:

- **Call the sponsor.** Typically the environmental manager, governmental affairs or public affairs manager at the company or agency will be the best source of information.

- **Call the regional office of EPA.** Names and phone numbers of Project XL contact points in EPA's regional offices are shown in **Appendix I**.

- **Call your state environmental regulator.**

- **Consult the EPA webpage.** There is a great deal of information about Project XL, including descriptions of specific projects, posted on the EPA website at **www.EPA.gov/ProjectXL**.

2) Volunteer to be part of the stakeholder involvement process. To be sure that people know of your interest in participating, you can contact the sponsor, your state environmental regulatory agency, or the XL coordinator in the EPA regional office (**Appendix 1**).

Before you express an interest, consider how much time you're willing to spend. If you become a member of a stakeholder group, you will be making a significant time commitment. There is normally no reimbursement or compensation for this time.

Some of the demands on your time could include:

■ **Time for regular group meetings.**

■ **Time spent reviewing documents between meetings.**

■ **Time spent researching or developing concepts or ideas.**

■ **Time spent in subcommittees or communicating with other stakeholders.**

If you are not sure you can handle this time commitment, you might choose instead to be a "commentor," someone who reviews information about the project and comments by phone, e-mail, letter, or at public meetings.

Direct participants who serve as members of the organized stakeholder group established for the project are likely to have more impact on the final outcome than commentators. But they also make a more significant investment of time and energy.

If there is an existing stakeholder group for the project, there may be an established procedure for selection of new members. If you're not invited to join the group right away, understand that it has little to do with your qualifications and everything to do with controlling the size of the group (for better group dynamics) and ensuring balanced representation.

3) Identify and communicate your interests and concerns. Speak up. Insist that your ideas and concerns be considered, but also be constructive. Submit comments so that your ideas will be on the record. Also educate yourself—identifying your interests often requires learning more about the project to be sure you know how your interests are best met in this situation.

If you decide you can't commit the time to be part of the stakeholder group, you can still make comments in a public meeting or in writing to EPA or other regulators. These comments are taken seriously by the regulators and can lead to changes in any agreements reached with the sponsor.

How Should Your Organization Decide Whether to Participate?

Many XL stakeholder groups include representatives of community and environmental organizations. Others include labor unions or other organizations representing workers. Some groups include representatives of national business or environmental groups as well.

But representing a group raises some additional challenges. You need to make sure there is agreement in your group that working in a collaborative manner on this project is consistent with the long-term goals of your group. Your group will also need to decide whether its representative is there as an official spokesperson of the group, stating the positions of your group, or is there as an individual free to express personal opinions.

Experience with prior XL projects suggests that group representatives sometimes feel uncomfortable presenting the conclusions of the stakeholder group back to their own group. Group representatives also had difficulties getting policy decisions from their groups in a timely manner. If your group wants to have an official group representative, you will need a communication mechanism within your group to ensure that people are kept informed of what's happening. You'll also need some way to ensure that decisions about group policy can be made quickly.

Figure 2 on the next page provides a self-assessment tool your group may find helpful in deciding whether to participate. Even if you answer "no" to a number of questions, it doesn't mean you shouldn't participate. It simply means that if your group is going to participate effectively, you will ultimately need to spend some time addressing these procedural issues.





Figure 2

SELF-ASSESSMENT TOOL FOR STAKEHOLDER GROUPS		
1) Does your membership support working with the sponsor in a collaborative manner?	YES	NO
2) Is there agreement within your group on the goals for the process?	YES	NO
3) Is your organization able to commit the time and resources that participation will require?	YES	NO
4) Are there well-established mechanisms for the representatives of your group on the XL stakeholder group to communicate regularly with your members.	YES	NO
5) Are there mechanisms in place for your group to make timely decisions regarding the XL project?	YES	NO
6) Do you already have established communication with the sponsor?	YES	NO
7) Does the proposed stakeholder group membership or process provide adequate representation to all interests?	YES	NO
8) Do you believe your voice will be heard during development of the XL proposal?	YES	NO

What Else Can You Or Your Organization Do to Help?

In addition to volunteering your own participation, there are many other ways you can help:

Inform Others About the Process.

If you belong to a community, environmental, or business group, talk about the project. See if you can get others interested. Find out what their interests or concerns might be. EPA, the state or the sponsor will make a presentation to your group, if requested.

Help the Sponsor Develop a Mailing List of Interested Stakeholders.

Give the sponsor names and addresses of people who should be on the mailing list. If you think everyone in your organization would like information, provide your mailing list to the sponsor or offer to mail materials to your group's members. Check with other organizations to see if they have names and addresses that should be included on the list.

Help the Sponsor Plan the Stakeholder Involvement Process.

Help the sponsor think through the various community and environmental interests that should be represented in the decision-making process. Then help the sponsor identify people who can speak for each of these interests.

Get information about other stakeholder processes in your community, and share information with the sponsor about what made them a success, what problems arose, and how these problems can be avoided or addressed.

Check with other groups with whom you are affiliated, such as national environmental or business groups, and find out what they've learned about participating in stakeholder processes.

Help the Sponsor Recruit Other Stakeholders for a Stakeholder Group.

Even if you are not able to participate, suggest people or groups who may be interested in the project. Help the sponsor by calling other people and asking them about their interest.

You could also take on responsibility for recruiting additional group members. You may be more effective in recruiting stakeholders than the sponsor, particularly with someone you know or who shares similar interests. A leader of an environmental group may be more willing to participate if approached by another environmentalist, just as a business person may be more responsive to another business person. In particular, provide a bridge to people or groups who may be wary of the sponsor or the project. Be sure to coordinate recruitment with the sponsor to avoid unnecessary duplication.

Volunteer to Serve As a Member of a "Core Group" That Helps the Sponsor Organize a Stakeholder Group.

Sponsors often find it helpful to meet first with a small group of representative stakeholders to help in setting up the full stakeholder group. This core group may help in recruiting the membership of the group and will discuss how the group can work together to ensure the whole group feels the process is fair and meets the needs of stakeholders and the sponsor. This core group may also work with the sponsor to develop a draft version of ground rules for the group, subject to review by the full group once it is assembled.

Help the sponsor evaluate whether the stakeholder group, once established, needs an up-front, team-building session or would benefit from joint training on how to work together effectively as a group.





Section I: **STAKEHOLDER INFORMATION**

Encourage others in the stakeholder group not to rush through issues about how you will be working together in order to get to the substance of the proposal. These issues about “the process” can prove to be very important later on. Encourage others to be patient during discussion of process issues.

Help the Sponsor Hold Public Meetings and Communicate With People Outside the Stakeholder Group.

The sponsor is expected to conduct public meetings and provide information to interested people who are not part of the organized stakeholder group. The sponsor and stakeholder group may decide that members of the stakeholder group should play a major role in communicating with the broader public. The stakeholder group might, for example, review draft versions of public information documents and give the sponsor feedback on whether the document seems objective and easy to understand. Stakeholders may also play a role in designing and conducting public meetings.

During public meetings you might be asked to present a report on the issues identified by the group or give a group report on the advantages and disadvantages of various alternatives. Remember that whenever you speak for the stakeholder group you have to represent the entire group, not just your own position. Similarly, if you are asked to lead a meeting or small group discussion, you will need to act like a facilitator, remaining neutral on the content of the discussion.

Improve Your Technical Understanding of the Issues.

This increases your ability to participate in a meaningful way and puts you on a stronger footing during technical discussions. You can ask the sponsor for information, or you can speak with EPA, state, or local government technical specialists or regulators to get information or access to people who can advise you.

If you want to get information from third-party sources, technical assistance may be made available through a local university. In some cases, sponsors may be willing to provide third-party technical assistance, or, where requests for technical assistance come from the entire stakeholder group, EPA funds can be used to obtain expertise.

Appendix 2 provides information about EPA technical assistance programs.

Talk With Friends and Members of Groups to Which You Belong About Their Interests and Concerns.

You can serve as a conduit for other people’s views. This is also a way of being sure that you don’t “lose touch” with what the rest of the community is feeling. Sometimes people get so involved in an issue that they forget that others in the community or in their organization don’t have all the information they do.

Seek Measurable Results.

XL projects must produce superior environmental performance—better than what is being achieved now. You can help by pushing for well-defined procedures for measuring whether, in fact, these results occur. Ideally these measures should be



something objective that are easy to identify and evaluate, such as substitution of environmentally preferable substances for hazardous products or raw materials, reduced emissions, or increases in the number of acres of land cleaned-up, or technologies tested.

What Should You or Your Organization Expect From the Stakeholder Involvement Process?

You should expect that:

The process will be open and transparent.

Everybody should know what the process will be, what's going on now, who's doing what, and what happens next.

Everybody will have access to information.

If it's going to feel like a partnership or team, everybody is going to need access to the same information. The sponsor may need to keep some information confidential if it is important to its competitive position. But other than that, the sponsor and the stakeholders need to go into the process expecting that all relevant information is on the table. At the same time, stakeholders should expect that while they will be provided full information related to the XL project, the sponsor is not expected to provide information unrelated to the Project XL proposal.

If the XL project is about the operations of a physical facility, stakeholders may need to visit the facility itself. Some sponsors need to limit access to facilities due to security, protection of proprietary information or quality control procedures. If visiting the facility is essential to the work of the stakeholder group, arrangements can usually be made to provide access, but not without reasonable lead time and careful planning.

Everybody will be treated with mutual respect.

Stakeholders, sponsors, consultants, and regulators should all receive respect. Respect means that people are listened to and given serious consideration, and everyone is assumed to have a genuine concern for both the environment and the community. All are assumed to have a constructive interest in the outcome of the project.

Everybody will have a genuine opportunity to influence outcomes.

The payoff for people who participate is the sense that their participation has made a difference for the environment, the economy, and their community. This means that there must be genuine opportunities to influence the project's development. To make this happen, stakeholders need to be offered opportunities to participate before decisions are made by either the sponsor or the regulators. This opportunity to participate should be early enough that stakeholders' ideas can contribute to the decision.

Having "an influence" doesn't mean that everything must conform to your beliefs. But all participants need to leave the process feeling their ideas were given serious attention.





Section I:

STAKEHOLDER INFORMATION



Everybody will take responsibility for a positive outcome.

Everybody needs to feel ownership of the project and be committed to its success. With this attitude, if something isn't working everybody concentrates on fixing the problem. They find an approach that works for everybody.

The sponsor alone can't ensure that the expectations listed above will be met. Meeting these expectations will require the commitment of both the sponsor and the participants.

IF YOU ARE A POTENTIAL SPONSOR

What Will a Sponsor Get Out of Stakeholder Involvement?

Although your organization will need to spend time and effort to make stakeholder involvement work, most people who've conducted stakeholder involvement programs believe it is a wise investment with significant returns.

To begin with, stakeholder support is a precondition for acceptance of your XL proposal. Stakeholder involvement is the primary means of assessing whether there is broad-based support for the project concept. Stakeholder support can even speed up the approval process, because regulators are more confident the impacts of the project will be carefully reviewed since the community and other stakeholders may play a role in monitoring implementation. Also, effective stakeholder involvement increases your credibility with regulators and helps reduce the amount of time it takes to build trust between you and the regulators.

There may be savings involved even if you find there is opposition. It's better to find out if there are potential problems or issues as early as possible. If you know about people's concerns early on, you can address them before becoming too committed to a particular approach, or you can make a decision not to submit a proposal, saving money that might have been spent on an unsuccessful process.

Stakeholder involvement also contributes to well thought-out plans. Stakeholders often identify assumptions or problems that could prevent effective implementation. Because they approach the issue differently than either sponsors or regulators, stakeholders may identify options or issues that the technical experts might miss.

Stakeholder involvement is also a way for you to enhance your relationship with the community. At a minimum, you will receive important information about how your operations affect the community. Stakeholder involvement is a way of building good will in the community. That good will may make a difference not only for this project but also when you want community support or approval for other aspects of your operations.

How Can a Potential Sponsor Assess its Ability to Work Positively With Stakeholders?

A starting point is your organization's current and past relationship with the community. If you have a strong positive relationship with the community, you'll start out with credibility. You probably have already established relationships with many of the people you will need to include in the process.

But if you have adversarial relationships with some of the possible participants, you may want to ask yourself if you are willing to do the extra work it will take to build a positive working relationship. The rewards may be great, but it will take extra effort.

One way to determine whether you are likely to work together effectively with stakeholders is to do a self-assessment of your existing relationship with the community. To conduct a quick self-assessment, complete the assessment tool on page 18.

If you find you answered "yes" to all the items, you are starting from a strong position for working with the community to develop an XL project. If you answered "no" to some of the items, think about how you will address these issues with your stakeholders. The more "no's" you have, the more challenging the stakeholder involvement process is likely to be.





- | | |
|----------------------------------------------------------------------------------------------------------------------------------------|--------|
| 4) E. _____
and are a part of the community. | YES NO |
| 5) Your organization has established
communication with all racial and economic
segments of the community. | YES NO |
| 6) Your organization has a good
employee relations history. | YES NO |
| 7) Senior managers have periodic
dialogues with your organization's
neighbors (commercial and residential). | YES NO |
| 8) Senior managers have periodic dialogues
with your organization's critics. | YES NO |
| 9) Senior managers know some environmental
and community group leaders well. | YES NO |
| 10) Senior managers are willing to discuss
issues brought up by stakeholders and
consider changes based on these
suggestions. | YES NO |
| 11) Senior managers are willing to commit your
organization's time, effort, and resources to
making this project a success. | YES NO |
| 12) Senior managers are receptive to ideas and
concerns expressed by workers. | YES NO |



What Stakeholder Involvement Does EPA Require?

EPA requirements for stakeholder involvement are defined in the Project XL Federal Register Notice of May 23, 1995, and in the Federal Register Notice titled *Clarifying the XL Process* issued April 23, 1997. Appendix 4 describes other EPA guides and information that may be useful.

Achieving “stakeholder support” often requires a more substantial stakeholder involvement program than what is defined in XL program guidance.

Generally speaking, the scope and complexity of the stakeholder process should match the scope and complexity of the project itself. If the sponsor is asking for significant changes from existing environmental requirements and national policy or if the project could have widespread impacts on the community or particular segments of it, then the stakeholder involvement process may need to be equally significant. If the changes or impacts are modest, then it may be appropriate to scale back the involvement process.

The scope and complexity of the process also reflects the level of interest and enthusiasm of the stakeholders. On some XL proposals it has been difficult to stimulate stakeholder interest. On other proposals the involvement process has greatly exceeded the minimum requirements.

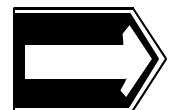
When Should Stakeholder Involvement Start?

You may want to talk with EPA and state regulators before you begin talking with stakeholder groups. There may be regulatory or other reasons, other than stakeholder reactions, why your proposal would not be accepted. Also, at some point EPA and state regulators will conduct a screening for eligibility based on the *Guidance for Compliance Screening* available on the Project XL web page. If they have concerns, you may want to know about these before you begin a public process.

But once these initial discussions have taken place, the experience with earlier XL projects shows that you should begin to consult stakeholders early, while you are still thinking about whether to develop or submit a formal XL proposal. Early consultation may be quite informal, such as an exploratory discussion over lunch or small informal meetings.

Early consultation should include individuals or groups you think might be interested in the project. They, in turn, can suggest others to whom you should talk.

Don’t avoid people you think might oppose the project, as these people often have valuable information about what it would take for the project to be successful. Also, “opposition” is sometimes created by how people are or are not included in the process. People who are included from the beginning often feel very differently than people who believe something is being forced upon them. People who don’t agree with the project are still likely to respect the fact they were approached directly by you at an early stage in the process.





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How Do You Set Up A Stakeholder Group?

Below is a series of steps you can follow to set up a stakeholder group. Although you have the primary responsibility for carrying out these steps, the stakeholders role becomes more important with each step. Experience shows that in the most successful processes, the sponsor and the stakeholders co-create the process.

Step 1: Do an assessment of the interest of community and environmental groups.

At this stage you are still deciding whether or not to prepare a proposal and what kind of things to propose if you do. You've probably held some preliminary conversations with the regional EPA office and your state regulator. You are now ready to begin developing your stakeholder involvement process.

Your first step is to talk to people in the community to make an initial assessment of how much interest there is likely to be. The simple rule is: If you want to know how much interest there will be in a project, ask the people who are most likely to be interested. Conduct a series of informal discussions with stakeholders you know, e.g., state and city officials, employee representatives, leaders of environmental or community groups.

Questions you may want to ask include:

- What is the level of community interest in the facility?
- How knowledgeable is the community about the issues surrounding your facility?
- What kinds of issues have been important to the community in the past?
- How active is the community on environmental or public health issues?
- Are there organized groups representing the community or environmental interests?
- Are there mechanisms by which workers can be represented?
- Will the project affect minority or economically disadvantaged people more than others?
- Who needs to be included in a stakeholder group in order for it to be seen as representative?
- What is the most effective way to involve stakeholders, (e.g., a series of workshops, a defined stakeholder group that meets regularly, etc.)?

Remember that various parts of your organization already have established relationships with people in the community. Do a quick check around your organization to identify these existing relationships. If other people in the organization are the primary point of contact with people in the community, have them set up the initial get-together, perhaps accompanying you.

Step 2: Decide what help is needed.

There are three kinds of help you might consider: project co-sponsorship, start-up assistance and routine meeting facilitation.

Co-sponsorship

You may want to form a partnership with a credible community or environmental group (or groups) who will serve as Project Co-sponsor(s). A co-sponsor may be particularly important if your organization is not well-known, or does not have an established track record for environmental excellence. If you are going to seek a co-sponsor it is important to do this early in the process. Organizations are not likely to be willing to be a co-sponsor if they are not included in the original planning.

● Start-up assistance

EPA can provide assistance to sponsors in initiating the stakeholder involvement process. EPA will provide support through a neutral facilitator. The facilitator will help sponsors of a stakeholder group, and lead the kick-off meeting, helping the group develop agreement on the process and ground rules for working together. Once the group is established, the start-up facilitator has completed his or her job, and the sponsor and stakeholders will continue to work together to build their own process. Contact your Project XL regional coordinator to get information on how to obtain this assistance from EPA.

● Routine meeting facilitation

Project-related start-up assistance provided by EPA is free of charge but generally ends after the first meeting. But EPA strongly recommends that you have a neutral facilitator throughout the entire stakeholder process.

A facilitator plays two roles: (1) an experienced facilitator has knowledge about how to help groups work together effectively and can help the sponsor plan a stakeholder involvement process that will be effective; and (2) facilitators are trained meeting leaders who can help design and conduct good meetings.

Facilitators are effective both because they have training and experience in helping people work together but also because they are neutral about the contents of the proposal. Even if there are people in the sponsoring organization who have facilitation skills, stakeholders will react more positively to an outside facilitator because the facilitator does not have a stake in any particular result.

Because neutrality is a matter of perception, sponsors may want to talk with people who could be direct participants about which facilitators would be acceptable. Sponsors won't want to hire a facilitator who is viewed as having a bias, because the value of neutrality will be lost. **Appendix 3** provides information on finding a facilitator.

■ Step 3: Develop a list of potential direct participants.

Once you decide what assistance will be helpful, identify people who are willing to be part of a stakeholder group that will meet with you regularly to discuss and develop the proposal.

One way to get started is to make a list of people who are likely to see themselves as affected by the project. Here's a quick checklist of the reasons people might see themselves as affected:

- **Proximity/exposure**, (e.g., workers or people who live near the facility or could be affected by land, air, water or soil pollution, or by construction impacts)
- **Concern for the effects of this project upon other land uses on this or adjoining land**, (e.g., whether this project frees up or forecloses the use of other land)
- **Concern for the effects of this project upon the environment**, (e.g., impact upon air or water, or on endangered species)
- **Economics**, (e.g., jobs, potential for economic development)





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- **Mandate**, (e.g., agencies whose job it is to protect a particular resource such as wetlands or endangered species, or who regulate land use)
- **Values/political philosophy**, (e.g., people who are strong advocates for “environmental stewardship,” or “reducing governmental waste and paperwork”)

One way to expand the list of potentially interested people is to ask for recommendations from people such as:

- **State agencies**
- **Mayor, or County Executive**
- **City Council member**
- **State legislators**
- **District school board member**
- **Local health officials**
- **Pastors of community churches**
- **Current and former Community Advisory Panel (CAP) members (if your organization already has one)**
- **State and local environmental organizations**
- **Academia or local universities**
- **Neighborhood associations of residents near a facility**
- **Environmental justice organizations**

You can show these people the list you’ve developed so far and ask them who else needs to be included for the stakeholder group to be seen as credible or representative.

The goal is to involve the stakeholders representative of all the major interests associated with the proposal.

Be sure you don’t leave out these groups:

● **State, regional, and national groups**

State, regional, and national groups may see themselves as stakeholders because local XL projects test ideas that may later be applied nationally. Don’t assume that the positions of local environmental or business groups are identical with those of comparable national organizations. It is better to seek participation from state, regional and national organizations from the beginning (assuming they are interested), rather than have them get involved late in the process after agreements have already been reached with local stakeholders.

● **Economically disadvantaged stakeholders or groups representing these interests**

EPA is particularly concerned about avoiding disproportionate adverse impacts on such groups and is very interested in projects that alleviate impacts currently experienced by such groups.

● **Employees**

Employees are a crucial group of affected stakeholders. Some facilities have a plant employee environmental advisory committee or other group from which candidates may be recruited. At union plants the method of selection may be subject to contractual requirements.

There are several issues you will need to address to ensure adequate worker representation: How can you eliminate fear of retribution if workers take positions different than management? Is time spent on an XL stakeholder group paid time? How can you ensure that the worker representatives are in fact perceived as representative?

Step 4: Decide what kind of process will be used.

Stakeholders often want a voice in decision making, not just access to information, and have needs and expectations of their own. The stakeholder involvement process is something that has to be agreed upon by all the parties who are participating.

When people are invited to participate, they are going to want to anticipate what time commitment is involved. For example, will the group participate in a series of workshops scheduled for key points in the development of the proposal, or will there be regular meetings?

Sometimes decisions about what kind of process it will be can be resolved in one-on-one discussions with potential participants. In other cases you may want to assemble a core group of stakeholders with whom you can discuss the options. Even the core group should include a range of viewpoints. If major interests feel left out, it will undercut the credibility of the process.

Step 5: Invite people on the list to participate.

Once you are confident the list is representative and credible, invite the people on the list to be part of the organized stakeholder group. A personal contact is almost always more effective than a letter, although the sponsor may want to follow up the personal contact with a letter.

Remember that you are asking people to donate their valuable time to the project. Even if these individuals work for organizations which are active on environmental issues, this project must still compete for their time with other important environmental issues in the community. You may have to convince people of the environmental benefits that can be achieved through the program before people will make the needed time commitment.

Recruitment of stakeholders may take positive and creative action on your part. You may need to seek people out to get them involved, rather than expecting they will just come to you. You may need to try new approaches to stimulate interest and generate the willingness to participate.

If national groups are interested in the project, you may need to create mechanisms, such as conference calls or videoconferencing to include people from these groups in the discussions.

If your project is of great interest to stakeholders, your challenge could be to keep the group to a workable size. When groups get larger than about 20 people, group dynamics become increasingly difficult. But limiting the size of the group must sometimes be balanced with the need to ensure that all major interests are represented.

Step 6: Hold the first stakeholder group meeting.

The first meeting is usually an “organizational” or kick-off meeting in the sense that it focuses primarily on how the sponsor and stakeholders will work together, not the contents of the XL proposal. During this first meeting the group needs to gain mutual understanding about the process and participants’ expectations and roles, rather than try to reach substantive agreements.

Consider the possibility of starting with a team-building session with the group or going through joint training on how to work together as a team. EPA may be able to provide third-party process assistance for team building, facilitation, or training.

Frequently the first meeting focuses on the ground rules for the stakeholder group. This is discussed in more detail below.





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Step 7: Agree on Ground Rules.

The ground rules define your role and responsibilities, and the role and responsibilities of the members of the stakeholder group. They also define the procedures you and the stakeholder group will follow throughout the development of the XL proposal and agreement.

The discussion of the ground rules typically begins during the first meeting of the group. But the process may take more than one meeting.

These procedures should be adopted by agreement of the participants. If you can't get agreement on how you are going to work together, there's little hope of agreeing on the project itself. Of course "consensus" doesn't always mean that everyone is equally enthusiastic. It does mean that everybody "consents" to the ground rules.

Typically it is easier for a group to react to and modify a "strawman" set of ground rules than create the ground rules from scratch. The word "strawman" simply means that this is a preliminary proposal that (because it is only made of straw) can be readily discarded or changed. The strawman may be perceived more neutrally if it is generated by the convenor or facilitator.

Topics to be covered in the ground rules include:

Role of the stakeholder group

Is the group advisory (e.g., it gives advice or makes recommendations), or does it make decisions that are binding on the sponsor? What obligations does the sponsor have for reporting what it did in response to recommendations?

Mutual respect rules

Does the group need guidelines to ensure that everyone—stakeholders, sponsors, consultants, and regulators — is treated with respect?

Method of decision making

Who are the decision makers? Will decisions be made by consensus? What constitutes consensus? Does any single stakeholder or constituency have a veto? How will disagreements be resolved? If there isn't unanimity, can people submit minority reports expressing their disagreements?

Membership of the group

What are the criteria for membership in the group? Are members considered representatives of their groups or constituencies? How will additional stakeholders be selected if more are needed or vacancies are created? Who makes the decisions about who gets added to the group?

Definition of responsibilities/ accountabilities

Beyond the ultimate authority of EPA and the state to decide whether a project goes forward, what are the roles of the sponsor, the governmental agencies involved, and the volunteer stakeholders at each step of the process?

Facilitator's role

Will a facilitator be used? Will the stakeholder group participate in selecting the facilitator? What role will the facilitator play?



Method of communication

How will the group share correspondence, meeting notes/minutes, or reports among the stakeholders? Who has the responsibility for making this happen?

Treatment of confidential information

How will information deemed competitively sensitive by the sponsor be protected and/or shared?

Technical assistance

Do the direct participants need training or technical assistance and what kind? Who will the stakeholders rely on for technical information? Is there a need for third-party technical assistance? Who will decide whether it is needed? How will such assistance be selected? Who will pay for it?

Decision not to proceed

If the sponsor decides not to submit a proposal or not to proceed with a project, what obligations does the sponsor have to the stakeholder group?

When you've completed the steps above, you are formally launched. From this point forward, the process can be determined by mutual agreement between you and the stakeholder group. As provided for in the ground rules, you and members of the stakeholder group will now work together to build a successful XL project.

How Do You Involve "Commentors"?

"Commentors," as EPA defines it, are stakeholders who are interested in an XL project but are not able to commit the time and resources necessary to be members of the organized stakeholder group. But they are willing to write a letter or e-mail message, make a phone call, or attend a meeting or workshop to make a comment on the proposal.

EPA requires sponsors to provide information to potential commentors and create periodic forums in which they can express their comments.

Here are some suggestions on how to involve commentors:

Step 1: Develop a mailing list.

You will need to mail information — bulletins, newsletters, reports, meeting announcement—to commentors. Begin right away to develop a mailing list that can be used for such mailings.

Some of the people to include on the list are:

- Immediate neighbors of the site/project
- Employees of the sponsor
- Local and state elected officials
- Government agency officials with responsibilities related to environmental protection or cleanup, water or air quality, or land use
- Community, environmental and business groups (including local and national organizations)
- Local newspapers, publications, or organizational newsletters





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Every time there's a public meeting, have a sign-in list to record the names and addresses of any attendees who are not already on the mailing list. Set up the mailing list so that there will be the option later of targeting specific audiences.

■ **Step 2: Send review copies of documents to key groups and individuals.**

One important way to keep commentors informed is to send them review copies of the important documents related to the project. Invite them to submit comments on these documents, within specified time limits. The key documents to consider sending out are:

- ***Draft proposal***
- ***Final Proposal***
- ***Questions from regulators (and your responses)***
- ***Draft Final Project Agreement***
- ***Final Project Agreement***

If the documents are long, prepare a short synopsis and send that along with a mail-in postcard on which people can request a copy of the complete document. Include the same postcard with any copies of the actual documents, so that people who receive them can request that the documents be sent to others. Some sponsors have developed web sites which allow people to download the documents that interest them. Another option is to publish a periodic newsletter. Include a hotline number in any newsletter stories so people can request copies.

■ **Step 3: Hold public meetings or workshops.**

Set up periodic meetings at which the public can get more information or make comments. The most effective time for public meetings is just before major decisions, when all the information is available but the public can still influence the decision. The key times for public meetings are:

- ***To review the draft proposal.***
- ***To review possible substantive changes in the proposal resulting from questions or suggestions from regulators.***
- ***To review the draft Final Project Agreement.***

Some of the ways to publicize public meetings are by issuing news releases, by putting out a newsletter containing the information people will need to participate effectively, and by paying for ads in the communication media.

If the meeting could be controversial or challenging, consider hiring a neutral facilitator. Facilitators not only have skills at conducting meetings, but their neutrality helps keep things calm.

Be sure to consider formats other than public hearings. Workshops—where people actually work together to complete a task—or other interactive kinds of meetings are usually far more satisfying than a hearing format.



What Is the Stakeholders' Role While the Sponsor Is Working out an Agreement with EPA and Other Regulators?

Once you submit a proposal, EPA reviews the proposal in collaboration with state, local, and/or tribal regulators. Often the regulators will have questions or suggestions for changes that will make the proposal more acceptable. Once the proposal is accepted in principle, a Final Project Agreement (FPA) is worked out between project sponsors and the regulators. This agreement captures the intent of the signators in carrying out the project proposal.

To this point the sponsor and stakeholders have been working very closely to develop the proposal. Now the sponsor and regulators are working together directly, and there may be considerable dialogue between them, sometimes leading to significant changes in the proposal. It is easy for stakeholders — who've donated considerable time and energy helping the project get this far along — to feel "cut-out" of the process during these negotiations.

You and the stakeholder group need to develop agreements, in advance of this stage, on how stakeholders will be kept informed and involved to the extent that they desire to be. One of the issues to discuss is how big a proposed change in the proposal must be to trigger a review by stakeholders. If it isn't easy to agree on "how big" a change must be, talk about "who decides" to notify or reassemble stakeholders.

The compelling reason for keeping stakeholders informed and involved is to be sure they continue to support the project. Their continuing involvement is also a way to identify any new concerns that could derail implementation.

Particularly when people have been involved in developing the proposal, they may have very strong feelings about changes made in the project. It would be a very unfortunate to develop strong stakeholder support then lose it because stakeholders weren't included during the final negotiations.

What Is the Stakeholder Group's Role During Implementation?

The Final Project Agreement will define the role of the stakeholder group during implementation. EPA strongly encourages XL sponsors to actively involve stakeholders in reviewing reports of the results of the project. Some groups have maintained a continuing interest in how the results are measured. In other cases, there has not been significant interest except in the final results. Sponsors will need to find the appropriate level of involvement based on the stakeholders' level of interest and the nature of the project.

If there is high interest or potential for controversy, it pays to sustain the involvement of stakeholders. Their continued involvement lends credibility to the study results and reduces the risk that stakeholder groups will challenge the manner in which studies were done.





APPENDICES

The appendices provide additional resources:

- **Appendix 1** lists Project XL contacts at each of EPA's regional offices. Call them to discuss your proposal, to request convening assistance, or to request technical assistance for your stakeholder group. EPA will support the efforts of project sponsors and stakeholders to develop XL proposals.
 - **Appendix 2** discusses the kinds of technical assistance that EPA can provide to sponsors and stakeholders.
 - **Appendix 3** discusses how to find a third-party facilitator.
 - **Appendix 4** lists other EPA guides or documents that provide additional advice about stakeholder involvement.
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Appendix 1 EPA PROJECT XL REGIONAL POINTS OF CONTACT

Region 1 (ME, NH, VT, MA, RI, CT)

Environmental Protection Agency
John F. Kennedy Building
Boston, MA 02203-0001
George Frantz (617) 565-2752
Fax (617) 565-3415

Region 2 (NY, NJ, PR)

Environmental Protection Agency
290 Broadway
New York, NY 10007-1866
Aleksandra Dobkowski
(212) 637-3676
Fax (212) 637-5045

Region 3 (PA, DE, DC, MD, VA, WV)

Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103
David Byro or Beth Termini (215) 814-5563
Mindy Snoparski (215) 814-3316
fax (215) 814-5103

Region 4 (KY, TN, NC, SC, MS, AL, GA, FL)

Environmental Protection Agency
61 Forsyth Street SW
Atlanta, GA 30303
Michelle Glenn (404) 562-8674
fax (404) 562-9594

Region 5 (MN, WI, IL, MI, IN, OH)

Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3507
Linda Martin (312) 353-9486
fax (312) 353-5374

Region 6 (NM, TX, OK, AR, LA)

Environmental Protection Agency
1445 Ross Avenue, Ste. 700
Dallas, TX 75202-2733
Adele Cardenas (214) 665-7210
fax (214) 665-3177

Region 7 (NE, KS, IA, MO)

Environmental Protection Agency
726 Minnesota Avenue
Kansas City, KS 66101
Dick Sumpter (913) 551-7661
fax (913) 551-7976

Region 8 (MT, ND, WY, SD, UT, CO)

Environmental Protection Agency
999 - 18th Street, Ste. 500
Denver, CO 80202-2466
Mary Byrne (303) 312-6491
fax (303) 312-6741

Region 9 (CA, NV, AZ, HI)

Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105
Mark Samolis (415) 744-2331
fax (415) 744-2360

Region 10 (WA, OR, ID, AK)

Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101
Bill Glasser (206) 553-7215
fax (206) 553-8338



Appendix 2

TECHNICAL ASSISTANCE AVAILABLE TO STAKEHOLDERS

EPA has set up a mechanism to provide task-specific technical assistance to XL stakeholder projects. The Institute for Conservation Leadership manages this service under a cooperative agreement with EPA.

The kinds of services available under this project include assistance with:

- Understanding technical issues
- Interpreting and evaluating technical information
- Facilitating the stakeholder process
- Providing other kinds of professional expertise

This assistance is limited to \$25,000 per group and is available only when requested by the entire stakeholder group.

For information, contact:

Institute for Conservation Leadership
6930 Carroll Avenue, Suite 420
Takoma Park, MD 20912
(301) 70-2900
e-mail: peter@icl.org or dianne@icl.org

If the project involves hazardous waste, technical assistance may also be available through a program called Technical Outreach Services for Communities (TOSC). The goal of the TOSC program is to inform, educate and empower communities with hazardous waste problems by providing technical information and guidance. TOSC uses five Hazardous Substance Research Centers (HSRCs) and a network of 23 universities nationwide to provide this support.

These services are coordinated by the Superfund Community Involvement Coordinator in each region. Your Project XL regional contact person can connect you with this individual.

Appendix 3

HOW TO FIND A THIRD-PARTY FACILITATOR

Typically, a facilitator is someone who is not associated with any of the parties and has no vested interest in the decision being made. This is to make sure that no one worries that the way a meeting or workshop is being run gives any particular organization an advantage.

It is helpful—but not mandatory—for the facilitator to be familiar with the organizations involved and the subjects of discussion. As a minimum, the facilitator needs to know enough to be able to follow the discussion. Since agencies often use numerous acronyms and technical jargon, this can be an important point. On the other hand, if the facilitator is too directly involved in the subject matter he or she may have opinions that make it hard to remain neutral, or he or she may be seen by one of the parties as biased or partial towards a particular point of view or organization.

There are many levels of skill and experience among people who call themselves facilitators. Some have just completed their training, while others may have 20+ years of facilitation experience in a variety of circumstances. Typically, their fees reflect these differences (although some relatively junior facilitators may seek “senior facilitator” fees). Facilitator fees range from \$500/day (in 1999 dollars) to \$2,000/day or more. A fully qualified facilitator can normally be hired in the \$750 to \$1,500/day range.





APPENDICES

There are several sources of information about qualified facilitators:

- Each EPA region has an “ombudsman” who is also responsible for providing conflict resolution assistance throughout his/her region. Each ombudsman has a list of qualified facilitators. Your Project XL contact person can provide you with this information.
- For a number of years, EPA has maintained a national contract for dispute resolution services to support its environmental and public policy efforts. Through this contract, EPA obtains the services of numerous qualified dispute resolution and stakeholder involvement specialists around the country. Deborah Dalton, the EPA contract manager, can be contacted at *Dalton.Deborah@epa.gov*, for information about consultants.
- Training officers of sponsoring organizations may have lists of facilitators who have conducted team building or management development programs for the organization.
- Most professional facilitators with environmental or public policy experience belong to one of the two professional organizations listed below. Typically, these organizations will provide rosters of their members) (whether they are active facilitators or not), and do not comment on the qualifications of the people on the rosters. You can get lists of professional facilitators by contacting:

Environmental and Public Policy Sector
**Society of Professionals
in Dispute Resolution**
1527 New Hampshire Avenue, 3rd Floor
Washington, D.C. 20036
(202) 667-9700 • fax (202) 265-1968
E-Mail: *spidr@spidr.org*

Public Participation

P.O. Box 10146
Alexandria, VA 22310
(800) 644-4273 • fax (703) 971-0006
E-Mail: *iap2hq@pin.org*

- In October 1998, Congress established the U.S. Institute for Environmental Conflict Resolution. At EPA's request, The U.S. Institute is in the process of constructing a "National Roster of Environmental Dispute Resolution and Consensus Building Professionals." They expect to have this roster in place by Summer 1999. The Institute expects that the roster will contain up to 400 names of experienced environmental facilitators, mediators, and arbitrators. The roster can be used by Federal agencies, state agencies, or parties to disputes with federal agencies. Contact Information: U.S. Institute for Environmental Conflict Resolution, 110 South Church Avenue, Suite 3350, Tucson, AZ 85701, (520) 670-5299.



Appendix 4 OTHER EPA STAKEHOLDER INVOLVEMENT RESOURCE MATERIALS

Draft EPA Manual on Consultative Processes: Better Decisions through Consultation and Collaboration, U.S. Environmental Protection Agency, March 25, 1988. *This guide provides an overview of all types of consultative and collaborative processes used by EPA including stakeholder involvement and alternative dispute resolution (ADR) approaches.*

Constructive Engagement Resource Guide: Practical Advice for Dialogue Among Facilities, Workers, Communities and Regulators, US EPA, Office of Pollution Prevention and Toxics, EPA-745-B-99-008, March 1999. "Constructive Engagement" is a term used *in the computer and electronic industry for efforts between facilities and stakeholders to work together in a cooperative, non-adversarial way to establish and monitor a facility's environmental management system. While this guide covers a wider range of activities than Project XL, it still provides considerable practical information appropriate to Project XL stakeholder involvement programs and is more detailed than the guide you are reading.*

Community Advisory Group Toolkit, Office of Solid Waste and Emergency Response (OSWER), US EPA, EPA 540-R-97-037, September 1988. *Although this guide is written for Superfund projects, it contains a great deal of information about advisory groups that will be equally useful for Project XL stakeholder groups. It also contains detailed descriptions of over 30 tools (techniques) for community involvement that can be used to reach "commentors" and the general public.*

Evaluation of Project XL Stakeholder Processes, US EPA, Office of the Administrator, EPA 1CO-7-98-009, September 1998. *This report describes lessons learned from a careful evaluation of the stakeholder involvement processes for four of the first XL projects.*

Project XL Best Practices for Proposal Development, US EPA, Office of Reinvention, EPA 100-F-99-002, February 1999. *This guide provides a template for preparing a Project XL proposal.*

Guidance for Compliance Screening for Project XL. *The document describes how EPA will screen potential Project XL sponsors to determine eligibility for Project XL. The purpose of this screening is to make an informed judgment regarding the likelihood of the sponsor's ability to achieve superior environmental results.*

The Model Plan for Public Participation, Public Participation and Accountability Subcommittee of the National Environmental Justice Advisory Council, Office of Environmental Justice, U.S. Environmental Protection Agency, Washington D.C., 10 pages, 1996, EPA 300-K-96-003. *This short guide contains a statement of guiding principles and critical elements for an effective public participation program. It also presents a statement of core values for the practice of public participation.*

Guide for EPA XL Project Teams, US EPA, Office of Reinvention, January 1999. *This is a guide for EPA staff providing guidelines for how to organize as an effective XL team and describing internal EPA roles and responsibilities at each step in the XL process.*